



E. EVANS WOHLFORTH, JR.
Director

Gibbons P.C.
One Gateway Center
Newark, New Jersey 07102-5310
Direct: (973) 596-4879 Fax: (973) 639-6486
ewohlforth@gibbonslaw.com

February 6, 2023

VIA ECF

Honorable Cathy L. Waldor, U.S.M.J.
United States District Court
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: Johnson & Johnson Health Care Systems Inc. v. Save On SP, LLC
Civil Action No. 22-cv-2632 (JMV) (CLW)

Your Honor:

As Your Honor is aware, this law firm represents defendant Save On SP, LLC ("SaveOn") in association with the firm of Selendy Gay Elsberg PLLC in the above-referenced matter. SaveOn writes to respectfully request a four-week extension of time to file all responsive pleadings, including its answer and any counterclaims, up to and including March 8, 2023. Pursuant to Federal Rule of Civil Procedure 12(a)(4)(A) SaveOn's answer is currently due February 8, 2023. The parties are engaged in ongoing negotiations concerning certain discovery disputes, and currently anticipate motion practice ahead of the February 28, 2023 conference. The proposed extension of time will allow SaveOn to effectively address the discovery issues.

There have been no extensions of SaveOn's time to file responsive pleadings following the Court's decision on SaveOn's motion to dismiss. Johnson & Johnson Health Care Systems Inc. has graciously consented to this request. A proposed stipulation and order is submitted herewith.

We thank Your Honor for your kind consideration of this request. Please do not hesitate to have the Court's staff contact me with any questions or if we may be of any assistance to the Court whatsoever.

Respectfully submitted,

s/ E. Evans Wohlforth, Jr.

E. Evans Wohlforth, Jr.

cc: All counsel (*via ECF*)